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6 Attorneys for Defendant  
BRIGIT MARIE BISSELL  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 BRIGIT MARIE BISSELL and  
JOSEPH HILL,

15 Defendants.  
16

Case No. 1:22-cr-00031-DAD-BAM

**STIPULATION TO VACATE STATUS  
CONFERENCE AND SCHEDULE MOTION  
HEARING; ORDER**

Date: April 13, 2022

Time: 1:00 p.m.

Judge: Hon. Barbara A. McAuliffe

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Antonio Jose Pataca, counsel for plaintiff, Kevin P.  
19 Rooney, counsel for Joseph Hill, and Assistant Federal Defender Erin Snider, counsel for Brigit  
20 Marie Bissell, that the Court may vacate the status conference currently scheduled for April 13,  
21 2022, at 1:00 p.m. before the Honorable Barbara A. McAuliffe and that the Court may establish a  
22 briefing schedule for a motion to suppress and set a hearing on such motion.

23 The parties agree and request the Court find the following:

- 24 1. The government has provided initial discovery and has responded to requests for  
25 supplemental discovery in this matter.
- 26 2. Counsel for both defendants wish to file a motion to suppress.
- 27 3. The parties have discussed and agreed that any such motion to suppress may be  
28 filed by May 9, 2022; any opposition brief may be filed by May 31, 2022; any reply to the

government's opposition must be filed by June 13, 2022; and the Court may set a hearing on the motion to suppress for June 27, 2022, at 10:00 a.m.

4. The parties agree that time within which trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, shall be excluded on the following bases:

a. Counsel for both defendants require additional time to review discovery, consult with their clients, conduct necessary investigation, and draft the motion to suppress. Counsel for both defendants believe that failure to grant a continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The government does not object to the continuance. Accordingly, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendants in a trial within the original date prescribed by the Speedy Trial Act.

b. The period of delay resulting from the filing of the motion to suppress, from the filing of the motion through the conclusion of the hearing on, or other prompt disposition of, such motion, is excluded in computing the time within which trial must commence pursuant to 18 U.S.C. § 3161(h)(1)(D).

**IT IS SO STIPULATED.**

Respectfully submitted,

PHILLIP A. TALBERT  
United States Attorney

Date: April 6, 2022

/s/ Antonio Jose Pataca  
ANTONIO JOSE PATACA  
Assistant United States Attorney  
Attorney for Plaintiff

HEATHER E. WILLIAMS  
Federal Defender

Date: April 6, 2022

/s/ Erin Snider  
ERIN SNIDER  
Assistant Federal Defender  
Attorney for Defendant  
BRIGIT MARIE BISSELL

1 Date: April 6, 2022

/s/ Kevin P. Rooney  
KEVIN P. ROONEY  
Attorney for Defendant  
JOSEPH HILL

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3  
4  
5 **ORDER**

6 The status conference currently scheduled for April 13, 2022, at 1:00 p.m. is hereby  
7 vacated. Any motion to suppress to be filed by defendants is due on or before May 9, 2022; any  
8 government opposition to the motion to suppress is due on or before May 31, 2022; and any  
9 defense reply to the opposition to the motion to suppress is due on or before June 13, 2022. The  
10 Court schedules a hearing on the motion to suppress for June 27, 2022, at 10:00 a.m. For the  
11 reasons set forth in the parties' stipulation, the time period of April 13, 2022, to June 27, 2022,  
12 inclusive, is excluded in computing the time within which trial must commence under the  
13 Speedy Trial Act, 18 U.S. C. § 3161, *et seq.*

14 IT IS SO ORDERED.

15 Dated: April 6, 2022

Dale A. Ingh  
UNITED STATES DISTRICT JUDGE